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Loan No. 8560702029 / Our File No. 07-09-8719

ECF filed on:

OCT 04 2007

Attorney for Secured Creditor
Bridgelock Capital c/o Asset Foreclosure Services, Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

ADALBERTO CANCIO,
MARIA A. GUERRERO,

Debtor(s)

CHAPTER 13
BANKRUPTCY NO.: 07-15249-BAM
DATE: November 01, 2007
TIME: 1:30 p.m.

OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN

Bridgelock Capital c/o Asset Foreclosure Services, Inc. is a Secured Creditor in the above-entitled bankruptcy proceeding and hereby submits the following Objections to the Confirmation of that certain Chapter 13 Plan proposed by Debtors.

1. This objecting Creditor holds a security interest in the form of a 2nd deed of trust on the property located at 1101 Cold Harbor Drive, North Las Vegas, NV 89030.

2. As of the filing date of the instant bankruptcy petition on August 22, 2007, the amount in default pre-petition was \$17,844.71; representing forty-seven (47) monthly payments, late charges, NSF charges (if any); advances for taxes and insurance (if any); and any foreclosure or Trustee's fees accrued with respect to the default.

3. The plan does not currently set forth the accurate amount for plan payment and does not propose to pay the arrearages to Bridgelock Capital c/o Asset Foreclosure Services, Inc. in a reasonable manner.

1 4. The Debtors are currently in contravention of 11 U.S.C. § 1322(b)(5) and the plan
2 should not be confirmed as proposed.

3 Any plan proposed by the Debtors must accommodate the accurate pre-petition arrearages
4 as reflected above in order to be reasonable and correct. Additionally, any plan proposed by the
5 Debtor should provide that payments to Bridgelock Capital c/o Asset Foreclosure Services, Inc.
6 begin as expediently as possible and that the pre-petition arrearages be paid in their entirety prior
7 to the expiration of sixty months.

8 WHEREFORE, Secured Creditor prays as follows:

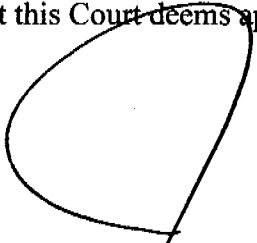
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10 (1) That confirmation of the proposed Chapter 13 plan be denied unless accommodation
11 of the above-referenced numbers can be accommodated;

12 (2) For attorneys fees and costs incurred herein in the amount of \$490.00;

13 (3) For dismissal of the Chapter 13 proceeding;

14 (4) For any and all other relief that this Court deems appropriate.

15
16 Date: _____

17
18 
19 _____
20 Stephanie L. Cooper, Esquire
21 Nevada Bar No. 5919
22 THE COOPER CASTLE LAW FIRM
23 Attorney for Bridgelock Capital
24 c/o Asset Foreclosure Services, Inc.
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**DECLARATION OF MAILING OF SECURED CREDITORS OBJECTIONS TO
CONFIRMATION OF PROPOSED CHAPTER 13 PLAN**

The undersigned hereby declares and certifies that on 10/4, 2007 a copy of the Secured Creditors OBJECTIONS TO CONFIRMATION OF PROPOSED CHAPTER 13 PLAN was served on the following parties by depositing a copy of the same in the United States Mail, postage prepaid and addressed to:

Terry Leavitt, Esq.
601 S. 6th Street
Las Vegas, NV 89101

Rick A. Yarnall
Chapter 13 Trustee
701 Bridger Avenue, Suite 820
Las Vegas, NV 89101

ADALBERTO CANCIO
MARIA A. GUERRERO
1101 Cold Harbor Drive
North Las Vegas, NV 89030

I declare under penalty of perjury that the foregoing is true and correct.


An employee of THE COOPER CASTLE LAW FIRM